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November 15, 2007

Ron Hortsman/
Energy Services Specialist
Western Area Power Administration
P.O. Box 281213
Lakewood, Colorado 80228-8213

Dear Mr. Hortsman:

Re: 10 CFR Part 905

Delta Montrose Electric Association is one of 44 member owners of Tri-State Generation and Transmission Association (Tri-State). It is our understanding that we are considered under the Western Area Power Administration (Western) definition to be a member, of a member-based association (MBA).

We are aware that Western is proposing rulemaking changes under 10 CFR 905, RIN 1901-AB24. These changes are in regard to Western's current process of supplying input in consideration of Integrated Resource Plans (IRP) that are required under Section 114 of the Energy Policy Act of 1992 EPAct.

Under the rulemaking changes, in section 905.11(b)(4), Western is proposing to modify the requirements that each member of an MBA individually approve the IRP. Western states that given the large number of members of some MBAs and the diversity of the member's interest, that it would be best to only require approval of an IRP by the governing body of an MBA, which serves the interests of each MBA member through the member's representation on the MBA board. In our case, this would mean that Tri-State's voice would replace the voice of our members.

DMEA strongly disagrees with the proposed change and encourages Western to leave the requirement as it is. Although it is easily understood to be a convenience for Western to make this change, the elimination of individual member input with regard to an IRP greatly limits the original intent for Western to obtain valid and open communication regarding the issues surrounding an IRP proposal. On one hand, Western is proposing to open the field of comments under section 905.12(b) yet the change on the MBA section counters the effort for more and valid input.



We further recognize that in the past, Western has not followed the current requirement of the rules to obtain individual approval of an IRP and so it becomes easier for Western to change the rule than to comply.

If the proposed change is approved, DMEA's voice will once again be diluted by the "averaging" vote of the governors of our MBA... Tri-State. Predominately, the existing culture of a G&T is negative toward the interest of change in relation to the promotion of renewable electric generation and in the promotion of demand-side energy efficiency programs. As you know, these kinds of programs are being focused on and are most recently, being proposed at both the Federal and State level. If Western's change is approved, DMEA and our members will have effectively lost our voice regarding these issues. We do not want to lose our voice. We strongly encourage Western to not make the proposed change to the MBA input as proposed.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dan McClendon", followed by a long horizontal line extending to the right.

Dan McClendon/General Manager
Delta Montrose Electric Association

Cc: Senator Ken Salazar